

Nabil Fayoumi
09/14/2000 09:25 AM

US EPA RECORDS CENTER REGION 5



1004602

To: Tab Sommer, Harriet Croke, SLIVERS, BUDAS
Subject: Re: Region 5 GPRA important!!!!!!!!!!!!!!

Tab,

We would like to make the following changes to the GPRA baseline post-closure and operating universes:

- ✓ 1) BASF Corp (MID 064 197 742), Seq.# 1 Drums
Remove this facility/unit from the GPRA baseline post-closure universe.
- 2) Delphi Energy and Engine Mgt. System, Grand Rapids, (MID 005 356 647), #2 Tanks
Add this facility/unit to the GPRA baseline post-closure universe.
- 3) Delphi Energy and Engine Mgt. System, Grand Rapids, (MID 017 079 625), #2 Waste Liq Cyanide
Make a change to reflect that the facility does not have approved control in place for the GPRA baseline post-closure universe.
- 4) Dow Corning, Midland, (MID 000 809 632), #5, Quench Pond
Add this facility/unit to the GPRA baseline post-closure universe.
- 5) Ford Motor Company Allen Park, Clay Mine, MID 980 568 711, #2 PC LF Cell
Add this facility/unit to the GPRA baseline post-closure universe.
- 6) Michigan DNR, Roscommon, (MID 980 825 632), #2 Toxaphene Pit
Add this facility/unit to the GPRA baseline post-closure universe.
- 7) Total Petroleum, Alma, (MID 005 358 130), #4 Pond1TC, #5 STANDBY1TC, #6 STANDBY2TC, #7 STANDBY3TC
Make a change to reflect that the units do not have approved control in place for the GPRA baseline post-closure universe.
In addition, Add unit Pond 2.
- 8) GMC Coldwater Road, Flint, (MID 005 356 860), #3 SURF IMP TRT S LAGOON
Add this facility/unit to the GPRA baseline post-closure universe.
- 9) Systech Environmental Corp., (MID 981 200 835), #1 Tank 1, #2 Tank 2, #3 Tank3, #4 Tank4, #5 Tank5, #6 Tank6, #7 Tank7 Add this facility/units to the GPRA baseline operating permit universe.



JOHN ENGLER Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
P.O. BOX 30028
LANSING MI 48909

Delbert Rector ~~DAVID F. HALE~~ Director

June 27, 1991

Mr. H. D. Roush, Manager
Quality & Ecology Services Department
BASF Corporation
Chemicals Division
1609 Biddle Avenue
Wyandotte, Michigan 48192

Dear Mr. Roush:

SUBJECT: Closure of Hazardous Waste Container Storage Unit
BASF Corporation, MID 064 197 742

The Michigan Department of Natural Resources (MDNR), Waste Management Division (WMD), has completed a review of the hazardous waste container storage unit closure plan/certification submitted by BASF Corporation (BASF), pursuant to Michigan's Hazardous Waste Management Act, 1979 P.A. 64, as amended (Act 64). The closure plan/certification was submitted on November 8, 1988. Based on this review, the WMD has determined that the cleanup activities associated with the closure of the container storage unit and the closure plan/certification fail to demonstrate clean closure in accordance with the closure performance standard established in R 299.9601 of the Act 64 administrative rules, and 40 CFR §§265.111 and 265.197. Therefore, a clean closure determination is denied. The WMD recognizes the status of the container storage unit as closed.

Financial Capability Requirements for Closure

Since the container storage unit has been closed, BASF is hereby released from the financial capability requirements for closure assurance and liability coverage under Part 7 of the Act 64 administrative rules. BASF is therefore no longer required to use the financial test to demonstrate financial capability for closure of this facility.

Post-Closure Requirements

Facilities failing to close in accordance with the closure performance standard are required to comply with the post-

June 27, 1991

closure requirements of 40 CFR §§265.117 - 265.120, and Part 7 of the Act 64 administrative rules. However, BASF is also subject to the requirements of Consent Decree #~~80-73699~~ entered between the State of Michigan and BASF in Federal District Court on November 12, 1985. Inquiries with MDNR, Environmental Response Division staff, indicate that BASF is in compliance with the Consent Decree at this time. BASF must maintain compliance with the Consent Decree. Therefore, the WMD is not requiring BASF to submit a post-closure plan and comply with the other post-closure requirements referenced above at this time.

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Corrective Action Responsibilities

BASF is advised that this release of financial capability requirements for the closure of the container storage unit does not release the company from any corrective action responsibilities under the Resource Conservation and Recovery Act of 1976 (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984. Questions regarding BASF's corrective action responsibilities should be directed to Mr. Rich Traub, Chief, Michigan Section of the RCRA Permitting Branch, Region 5, U.S. Environmental Protection Agency, at telephone number 312-886-6136.

Please contact Ms. Ronda L. Hall, Environmental Engineer, Waste Management Division, at 517-373-9548, if you have any questions.

Sincerely,

Delbert Rector
Delbert Rector
Director
517-373-2329

cc: Mr. Adam Bickel, BASF
✓ Ms. Lorraine Kosik, U.S. EPA
Mr. Rich Traub, U.S. EPA
Mr. Steve Buda, DNR
[Ms. Ronda L. Hall, DNR
Mr. Dave Slayton, DNR
Ms. JoAnn Merrick, DNR
Mr. Tom Sampson, DNR
Mr. Charles San Juan, DNR
HWP/C&E File

BASF Corporation
Chemicals Division

orig → Ronda → C.E.
XC. Detroit Distr
DE

BASF

November 7, 1988

RECEIVED

NOV 08 1988

Waste Management
Division

Mr. Kenneth J. Burda
Michigan Dept. of Natural Resources
Hazardous Waste Permits Section
Waste Management Division
P. O. Box 30028
Lansing, MI 48909


Dear Mr. Burda:

Subject: Closure Plan for Hazardous Waste Storage Units
BASF Corporation Chemicals Division MID 064197742

In compliance with the agreed upon November 8, 1988 submittal date, please find enclosed the Closure Plan to allow for the withdrawal of Interim Status for on-site storage of hazardous waste materials in excess of 90 days at BASF Corporation's Wyandotte North Works site.

If you have questions, please contact me at (313) 246-6106.

Sincerely,


H. D. Roush
Manager
Quality & Ecology Services Dept.

mn
enc.

BASF Wyandotte Corporation



Wyandotte, Michigan 48192
313 246-6100

TWX: 810-231-5756 (BASFWYAN)

April 23, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

No. P 447 526 723

Mr. William G. Muno, Chief
U. S. Environmental Protection Agency
Hazardous Waste Enforcement Branch
RCRA Enforcement Section - 5HE-12
230 South Dearborn Street
Chicago, IL 60604

HWEB
RECEIVED
APR 26 1985

Re: Letter of Warning
BASF Wyandotte Corporation
MID 064 197 742

Dear Mr. Muno:

Per your March 29, 1985 request, BASF Wyandotte Corporation (BWC) is forwarding to your attention an up-to-date Closure/Post Closure Plan for the Wyandotte Works MID 064 197 742. Two (2) copies have also been forwarded to the Michigan Department of Natural Resources.

Yours truly,

H. D. Roush
Manager
Quality Assurance, Hygiene
and Environmental Protection

mh
enc.

cc: Michigan Dept. of Natural Resources
Hazardous Waste Division
15500 Sheldon Road
Northville, MI 48167

Certified #P 447 526 724

STATE OF MICHIGAN



S.E. Michigan Field Office
15500 Sheldon Road
Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
E. R. CAROLLO
MARLENE J. FLUHARTY
STEPHEN F. MONSMA
O. STEWART MYERS
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

January 23, 1985

BASF Wyandotte Corp
1609 Biddle Avenue
Wyandotte, Mich.

RE: MID 064197742

Gentlemen:

As part of our FY85 Hazardous Waste Management Cooperative Agreement with the U.S. EPA, we are obligated to review the adequacy of the closure and post-closure plans for all hazardous waste treatment storage and disposal facilities (TSDFs) in the state.

Your facility falls under this classification. Therefore, please submit two up-to-date copies of your closure plan for your treatment, storage, and disposal facility by February 15, 1985.

The above should be sent to the following address:

Hazardous Waste Division
Michigan Department of Natural Resources
15500 Sheldon Road
Northville, MI 48167

If you have any questions regarding this letter, please contact me at (313) 459-9180.

Sincerely,

Benedict N. Okwumabua, PhD.
District Supervisor
Hazardous Waste Division

cc: U.S. EPA
J. Bohunsky
A. Howard

MAR 29 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

BASF Wyandotte Corporation
2000 Bielle Avenue
Wyandotte, Michigan 48192

Re: Letter of Warning
BASF Wyandotte Corporation
MID-064 197 742

Notification:

On January 23, 1985, the Michigan Department of Natural Resources (MDNR) requested that BASF Wyandotte Corporation submit a copy of their closure plan. To date, MDNR has not received the corporation's closure plan.

The MDNR is obligated to review the adequacy of closure plans under 40 CFR 300 Subpart G through the FY 85 Hazardous Waste Cooperative Agreement with the U.S. Environmental Protection Agency (U.S. EPA).

Because the BASF Wyandotte Corporation failed to submit a copy of their closure plan to MDNR, the U.S. EPA is requesting that BASF Wyandotte Corporation provide our Agency with a copy of the closure plan. Failure to provide this plan within 30 days of receipt of this notice will subject the facility to further enforcement action. Please forward a copy of an up-to-date closure plan to:

U.S. Environmental Protection Agency
Hazardous Waste Enforcement Branch
RCRA Enforcement Section - SHE-12
230 South Dearborn Street
Chicago, Illinois 60604

MAR 2 8 1952

RECEIVED
U.S. DEPARTMENT OF JUSTICE

U.S. DEPARTMENT OF JUSTICE
WASHINGTON, D.C.
MAR 2 8 1952

U.S. DEPARTMENT OF JUSTICE
WASHINGTON, D.C.
MAR 2 8 1952

TO: SAC, NEW YORK
FROM: SAC, CHICAGO
SUBJECT: [Illegible]
[Illegible text follows, appearing to be a memorandum or letter body with several paragraphs.]

U.S. DEPARTMENT OF JUSTICE
WASHINGTON, D.C.
MAR 2 8 1952

Two additional copies of the closure plan should also be sent to:
 Michigan Department of Natural Resources
 Researcher's Division
 16500 Sheldon Road
 Northville, Michigan 48167
 If you have any questions, please contact Mr. Steven E. Johnson of my staff
 at (312) 888-4502.

Sincerely yours,

William E. Rocco, Chief
 RMA Interagency Section
 cc: J. Kellumsky, RMA
 R. O'Donnell, RMA
 O.S. District Office

SR JOHNSON:SPJ:WI/MI Unit:3-27-85

TYPYST	AUTHOR	STU #1 CHIEF R. 10 9-25-85	STU #2 CHIEF	STU #3 CHIEF	NPS CHIEF	WAD CHIEF	Y. 1000 CHIEF
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OFFICE OF THE DIRECTOR, FBI

MEMORANDUM FOR THE DIRECTOR

FROM: SAC, NEW YORK

SUBJECT: [Illegible]

[Illegible text block]

[Illegible text block]

SEARCHED	SERIALIZED	INDEXED	FILED	APR 1964	FBI - NEW YORK
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BASF Wyandotte Corporation



100 Cherry Hill Road
P.O. Box 181
Parsippany, N.J. 07054
201/263-0200

April 9, 1981

BASF Wyandotte Corporation
1609 Biddle Avenue
Wyandotte, Michigan 48192

MID 064 197 742

The maps and drawings furnished with the original application (11/17/80) are valid, except for reference to the surface impoundment. Kindly strike out all labels referring to "surface impoundment", as per the reproductions attached to this revised application.

BASF Wyandotte Corporation



100 Cherry Hill Road
P.O. Box 181
Parsippany, N.J. 07054
201/263-0200

2/00

April 8, 1981
Certified Mail
Return Receipt Requested
P29-2144602

RECEIVED

APR 11

WASTE MANAGEMENT
EPA REGIONAL OFFICE
CHICAGO

Permit Contact (5EP)
U. S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Ill. 60604

Gentlemen:

Pursuant to a meeting held on April 2, 1981 with Mr. J. Boyle of your organization, BASF Wyandotte Corporation is submitting a revised and modified RCRA interim permit application. The original application was sent to you on November 17, 1980.

Key modifications are as follows;

1. Application for use of a surface impoundment for treatment has been deleted.
2. All wastes identified as "D000" only have been deleted. (Form 3, page 3).

Surface Impoundment Deletion

The original application included the use of surface impoundment for treatment as a protective action on our part. Normal wastewater flow to the pond is non-hazardous. Once during the past several years an unplanned and sudden spill of a hazardous waste was collected and contained in the pond and removed to rail cars within a 48-hour period. This was a one-time emergency action only. Due to the pond's impermeability (clay base) the short-term action to cleanup the spill prevented environmental contamination.

Subsequent to our original application, on Nov. 19, 1980, EPA published at 45 FR 76626 a definition of a spill as "---- the accidental spilling, leaking, pumping, emitting, emptying or dumping of hazardous wastes or materials which, when spilled, become hazardous waste into or on any land or water", (40CFR260.10(a) (64a)). EPA also promulgated at 40CFR122.21(d) (3) the regulation that "A person is not required to obtain a RCRA permit for those activities he carries out to immediately contain or treat a spill ----". The pond in question clearly falls under the above exclusion.


Waste Deletion

Those wastes originally designated on our application are not RCRA hazardous wastes per 40CFR260; rather, they are wastes which BASF has voluntarily decided to manage as if they were hazardous for self-protective reasons. Mr. Boyle, as well as other EPA officials of other regions, indicated that D000 was an invalid code.

Due to the permitting exclusion allowed for activities taken to immediately mitigate a spill plus the fact that only non-hazardous waste generally enters the discussed pond, BASF has decided to discontinue further interim status actions for that particular facility.

Kindly inform us within thirty (30) days if our interpretations or decisions are incorrect. Thank you for your assistance.

Very truly yours,


M. A. Wisniewski, P.E.
Manager

Corporate Environmental Protection

For the Office of the Director,
Corporate Environmental Protection

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